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★ OCT 22 2018 ★

LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Nancy F. Manz
Plaintiff(s),

-against-

REQUEST FOR
CERTIFICATE OF
DEFAULT
18 -CV-5171 (JFB)(AYS)

Eileen Giagrasso, Manuella Ignacio
Patrice Kelley, Mary Goldin
Lori Raffinelli, Richard Murphy
Defendant(s).

RECEIVED

OCT 22 2018

EDNY PRO SE OFFICE

TO: DOUGLAS C. PALMER
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Please enter the default of defendant(s), Eileen Giagrasso ETAL

pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for failure to plead or otherwise
defend this action as fully appears from the court file herein and from the attached affirmation of

Dated: 10.22.2018

By: Nancy F Manz
(Signature)

Nancy F. MANZ
(Print name)

66 GREYSTONE ROAD
(Address)

Rockville Centre NY 11570

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Plaintiff(s)

-against-

Filleen GINGRASSO ET AL,
Defendant(s).

**AFFIRMATION IN SUPPORT
OF
REQUEST FOR CERTIFICATE
OF DEFAULT**

CV - - ()

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Nancy F Manz hereby declares as follows:

1. I am the plaintiff in this action.
2. This action was commenced pursuant to 42 U.S.C. 1983 / 18 USC 2510-2521.
3. The time for defendant(s), Eileen Giagrosso et al to answer or otherwise

move with respect to the complaint herein has expired.

4. Defendant(s) Eileen Giagrasso et al has not answered or otherwise moved with respect to the complaint, and the time for defendant(s) Eileen Giagrasso et al to answer or otherwise move has not been extended.

5. That defendant(s) Eileen Giagrasso et al is not an infant or incompetent. Defendant(s) Eileen Giagrasso et al is not presently in the military service of the United States as appears from facts in this litigation.

6. Defendant(s) Eileen Giagrasso et al is indebted to plaintiff,

_____, in the following manner (state the facts in support of the claim(s)):

~~On the Mar~~ On March 27, 2018 I became aware through
Conversation that Eileen Giagrasso on March 25, 2018

listened (AS I believe WAS A Regular practice) to my conversations with colleagues and a Doctor who was giving a telephone Postoperative Report to a patient's family member. This Revelation alarmed me and upset me. I Knew that this was illegal practice. She listened on a electronic device that was not known to anyone in the room. On April 2nd. I Reported this evidence of a felony (NY State) to Mary Goldin (Dept Head Human Resources) and Lori Roffinelli (Ethics Committee SVCH). At the time I told them about many other instances that this criminal behavior (see Attached)

WHEREFORE, plaintiff NANCY F. MANZ requests that the default of defendant(s) Eileen Giagraso Etc be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated:

10/22/2018

By: Nancy F Manz
(Signature)
(Print Name of Plaintiff Pro Se)
(Address)
(Telephone Number)
(E-mail address)

Nancy F. Manz
65 Greystone Road
Rockville Centre NY 11570
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(1st page of attachment)

affected other employees in our department (PACU at SNCH)

Ms Goldin and Ms Raffinelli, after this 90 minute meeting whereby I gave evidence that Manuella, Ignacio, Patrice Kelly and Eileen were aware, and participated in this behavior on a regular basis.

Ms Goldin and Ms Raffinelli assured me that this crime would be investigated. In fact they thanked me for the report saying "you saw something and said something" that it was what we want."

However, this "Casedropping" on March 24, 2018 which occurred for 6 hours from 9am until after 2³⁰pm, was never investigated.

Instead, I was harassed over 2 months by Mary Goldin, Patrice Kelly and Manuella Ignacio with false statements and lies.

On June 20, 2018 my position was terminated and I was laid off without cause.

Our Department had 3 open positions. I was not offered any of them. Of the 138 people laid off, I was the only ~~para~~ direct patient care position eliminated in the hospital.

The Hospital had told its board that no patient care RNs would be eliminated

(2nd page)

I am accusing Eileen Giagrasso of "eavesdropping" with an electronic device without a warrant.

I am accusing Manuella Ignacio and Patricia Kelly of participating in this practice. I also am accusing them of harboring felonious behavior of Eileen Giagrasso on the date of March 24, 2018 and conspiring to cover up the crime.

I am accusing Mary Goldin and Lori Raffinelli of Harboring the Felony of Eileen Giagrasso and Patricia Kelly and Manuella Ignacio as of April 2, 2018 (on or about)

I am accusing Richard Murphy, CEO of South Nassau Community Hospital (SNCH) of harboring the felonious behavior of Eileen Giagrasso, Patricia Kelly, Manuella Ignacio and ~~others~~ possibly others.

No signs were ever posted, as is the law, that areas could be under Audio Surveillance.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-X

Nancy F. Manz

Plaintiff(s),

CERTIFICATE OF
DEFAULT

-against-

CV - - ()

Eileen Giagrasso, Manuela Ignacio
Patrice Kelly, Mary Golden Defendant(s).
Lori Ruffinelli, Richard Murphy

I, Douglas C. Palmer, Clerk of Court of the United States District Court for the Eastern District of New York, do hereby certify that the defendant Eileen Giagrasso et al has not filed an answer or otherwise moved with respect to the complaint herein. The default of defendant Eileen Giagrasso et al is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: , New York
, 20__

DOUGLAS C. PALMER, Clerk of Court

By: _____
Deputy Clerk

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Plaintiff(s),

Nancy F. Manz
-against-

Eileen Giagrasso, Et Al
Defendant(s).

AFFIRMATION OF SERVICE

_____-CV-_____() ()

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I *Nancy F. Manz*, declare under penalty of perjury that I have
served a copy of the attached *Request for Certificate of Default.*
upon *Eileen Giagrasso, Monella Igracio, Patricia Kelly, Mary Golden*
by mailing it to *Lore Raffinelli, Richard Murphy*

whose address is: *South Nassau Community Hospital*

Dated: *10 - 22*, 20*18*
Central Islip, New York

May Henry
Signature

65 Greystone Road
Address

Rockville Centre NY
11570
City, State & Zip Code